

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: ANA TEMPLE,	:	Chapter 13
Debtor(s),	:	Case No. 5:22-bk-02392-MJC
 YAHYA ALMADANI,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
ANA TEMPLE, ANA’S PARROTS AND	:	
SUPPLIES CORPORATION, and	:	
JACK N. ZAHAROPOULOS, TRUSTEE,	:	
Respondent(s)	:	

**MOTION OF YAHYA ALMADANI
FOR RELIEF FROM STAY WITH CONCURRENCE**

AND NOW COMES Movant **YAHYA ALMADANI**, a creditor of **ANA’S PARROTS AND SUPPLIES CORPORATION**, by and through its Attorneys, **J. ZAC CHRISTMAN, ESQUIRE**, with Motion for Relief from Stay with Concurrence with regard to litigation in the Court of Common Pleas of Monroe County docketed as **Yahya Almadani v. Ana Temple**, Individually and d/b/a **Ana’s Parrots and Supplies Corporation** at 1681-CV-2021, and in support thereof avers:

1. Debtor(s) **ANA TEMPLE** (“Debtor”) filed a Chapter **13** Bankruptcy Petition on December 12, 2022 (“the Petition Date”).
2. **ANA’S PARROTS AND SUPPLIES CORPORATION** is a corporation owned by Debtor.
3. On December 3, 2021, the Court of Common Pleas of Monroe County (“the State Court”), in the case of **Yahya Almadani v. Ana Temple**, Individually and d/b/a **Ana’s Parrots and Supplies Corporation**, docketed at 1681-CV-2021 (“the State Court Litigation”), entered an Order that Overruled Preliminary Objections that sustained of Unfair Trade Practices and Consumer Protection Law, Fraudulent Misrepresentation and Vicarious Liability claims, and Punitive Damages against **Ana’s Parrots and Supplies Corporation**, but Sustained Preliminary Objections to dismiss Breach of Contract Claims and individual claims against Debtor.

4. As Debtor remains in the case and the principal, owner and officer of Ana's Parrots and Supplies Corporation, the State Court has request relief from stay to proceed with the State Court Litigation.

5. Movant **YAHYA ALMADANI** requests relief from stay to pursue the State Court Litigation.

6. Debtor, through Counsel, Vincent Rubino, Esquire, has indicated her concurrence in the relief requested.

7. **JACK N. ZAHAROPOULOS, TRUSTEE**, through Counsel, has indicated his concurrence in the relief requested.

WHEREFORE, Movant **YAHYA ALMADANI** prays this Honorable Court for an Order that GRANTS the Motion of **YAHYA ALMADANI** for Relief from Stay to pursue litigation in the Court of Common Pleas of Monroe County in the case of Yahya Almadani v. Ana Temple, Individually and d/b/a Ana's Parrots and Supplies Corporation, docketed at 1681-CV-2021, against **ANA'S PARROTS AND SUPPLIES CORPORATION**, that such Order **not** be subject to the stay of order pursuant to Rule 4001(a)(3). and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully submitted,

/s/ J. Zac Christman
J. ZAC CHRISTMAN, ESQUIRE
Attorney for Movant
Attorney I.D. No. 80009
556 Main Street, Suite 12
Stroudsburg, PA 18360
(570) 234-3690, fax (570) 234-3675
zac@fisherchristman.com